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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,

Plaintiff,

vs.

RIOT GAMES, INC.,

Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUIN

PRELIMINARY NOTICE OF DAMAGES
FOR THE FORTHCOMING -

PLAINTIFF'S MOTION FOR DAMAGES
EVALUATION AND SUMMARY OF
RELIEF SOUGHT

Dated this: 06 FEBRUARY 2025

M. WOLSTENHOLME.

[MARC WOLSTENHOLME]

1 **PRELIMINARY NOTICE OF DAMAGES FOR THE FORTHCOMING -**
2
3 **PLAINTIFF’S MOTION FOR DAMAGES EVALUATION AND SUMMARY OF**
4 **RELIEF SOUGHT**
5

6
7 **I. INTRODUCTION**

8 **This is a preliminary readiness document and not a final account.**

9 Plaintiff Marc Wolstenholme (“Plaintiff”) submits this Motion for Damages
10 Evaluation and Summary of Relief Sought in the case against Riot Games, Inc. (“Defendant”) for
11 copyright infringement, anti-competitive practices, intentional infliction of emotional distress,
12 and related claims. This motion outlines the damages incurred by Plaintiff, quantifies the relief
13 sought, and substantiates the profound harm caused by Defendant’s alleged actions.
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16 **II. DAMAGES SOUGHT**
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19 **1. Economic and Financial Damages**
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- 21 (a) Unrealized Revenue from Plaintiff’s Creative Properties, Plaintiff’s inability
22 to monetize his M.W. Wolf Megaverse, including the Bloodborg manuscript,
23 due to Defendant’s infringement and market saturation.
24

25
26 *Estimated damages: £500 million.*
27

(b) Loss of Career and Financial Stability. Loss of Plaintiff's employment as a university lecturer and associated career progression due to emotional toll and financial hardship.

Estimated damages: £185,000.

(c) Family Court Costs. Ongoing costs of child contact proceedings and related expenses.

Estimated damages: £30,000.

(d) Litigation and Administrative Costs. Expenses incurred by Plaintiff to compile evidence, conduct legal research, and defend his rights as a litigant in person.

Estimated damages: £1 million.

2. Emotional and Psychological Damages

(a) Intentional Infliction of Emotional Distress. Aggravation of Plaintiff's complex PTSD and related conditions due to Defendant's actions, threats, and retaliation.

Estimated damages: £100 million.

(b) Impact on Family Life. Loss of access to Plaintiff's child outside of supervised contact, exacerbating emotional harm.

Estimated damages: £50 million.

3. Reputational Harm

(a) Damage to Plaintiff's Creative Brand. Harm to Plaintiff's reputation and brand as a writer due to Defendant's infringement and public misrepresentation.

Estimated damages: £25 million.

(b) Defamation and Retaliation. Retaliatory actions and defamatory attacks against Plaintiff, including hate mail and harassment.

Estimated damages: £10 million.

1 **4. Anti-Competitive Practices**

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3 (a) Violation of California Business and Professions Code §17200 Unfair

4 competitive practices by Defendant, suppressing Plaintiff's market entry and

5 opportunities.

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8 Estimated damages: £50 million.

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10 **5. Punitive Damages**

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13 To penalize Defendant for malicious, reckless, and unethical conduct, including

14 deliberate copyright infringement, gaslighting and bad faith negotiations.

15

16 Estimated damages: £500 million.

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1 **III. TOTAL DAMAGES SOUGHT**

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3 Economic and Financial Damages: £651.185 million.

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6 Emotional and Psychological Damages: £150 million.

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8 Reputational Harm: £35 million.

9

10 Anti-Competitive Practices: £50 million.

11

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13 Punitive Damages: £500 million.

14

15 *Grand Total: £1.386 billion.*

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17

18 Plus, lifetime of copyright reasonable royalties for all Lore and Copyrighted

19

20 characters and backstories for every future project or program containing any element of my

21 infringed upon IP,

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1 **IV. SUPPORTING EVIDENCE**

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3 Plaintiff has provided, and will continue to provide, extensive evidence
4 supporting the damages sought, including but not limited to:
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7 Documentation of Copyright Infringement: Thousands of examples of direct and
8 strikingly similar elements between “Bloodborg” and Defendant’s “Arcane” series and spin-off
9 projects.
10

11 Correspondence and Retaliatory Threats: Emails and letters from Defendant’s
12 legal representatives demonstrating bad faith, intimidation, and ethical misconduct.
13

14 Medical Records and Personal Impact: Evidence of Plaintiff’s complex PTSD,
15 exacerbated by Defendant’s actions and prolonged litigation. Along with a medication list and
16 court papers of UK based criminals, family and MOD tribunal courts.
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19 Financial Records: Proof of Plaintiff’s loss of income, legal expenses, and
20 economic hardships directly linked to Defendant’s conduct.
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V. RELIEF REQUESTED

Plaintiff respectfully requests the following relief:

Award of Damages: The court grants damages as outlined above, totaling £1.386 billion.

Plus, lifetime of copyright reasonable royalties for all Lore and Copyrighted characters and backstories for every future project or program containing any element of my infringed upon IP.

Court Oversight: Judicial intervention to ensure a fair and expeditious resolution to this case.

Sanctions for Misconduct: Appropriate sanctions against Defendant for bad faith negotiations, retaliation, and ethical violations.

Equitable Relief: A permanent injunction to prevent Defendant from further exploiting Plaintiff's intellectual property.

STATEMENT OF PERSONAL DAMAGE

I have complex PTSD from an incident which placed me in a coma in the British Army at the tender age of 17 years old. I served for a further 10 years, never being medically fit and carrying many injuries and suffering from mental illness and experiencing many traumatic events until I was medically discharged in 2011. I found living in a city extremely hard due to an acquired brain injury and damage to my left ear which makes sound unbearable at times. I used many prescription, sleep and illicit drugs and alcohol to cope with my disabilities and emotional-psychological vulnerabilities.

During a belt of insomnia in the summer of 2014, I got out of bed and began writing. Writing soon became my primary means of therapy. People suffering from PTSD use journalling and trauma writing as therapy, to take agency over the past, to make sense of it and to gain control over it. A part of the problem with controlling or regulating trauma and it's affects, is that trauma is fracturing and unpredictable. Trauma is tricky, it's strange, it's oblique and foreign to the mind. It manifests in myriads of ways, disorders, emotions and behaviours. By writing it down, in journal logs or in fictional stories, the sufferer can begin to make sense of it and gain control over it. Writing also acts as exposure therapy at a safe distance, creating a bridge between ones suffering and their mind.

Its standing in the dark and not seeing monsters, it's jumping in the deep end and swimming to safety, it's watching a horror movie, then sleeping like a baby.

Thus, stealing one's trauma writing- like Riot Games are alleged to have done- is the filthiest form of copyright infringement. It constitutes Psycho-emotional abuse and privacy

1 violations. Its stealing one's medication, it's akin to taking one's inhaler away during an asthma
2 attack. Or stealing a wheelchair from a double leg amputee. It's filthy, and their retaliations after,
3 have been even filthier... it is alleged.

4
5 During the period, when the work (Bloodborg: The Harvest) was alleged to have
6 been stolen (2019-2020), I had a baby with my ex-girlfriend, and I was working as a University
7 College Lecturer on a salary of around 37.000 a year. I was already taking on managerial
8 responsibilities. I was due to step up into fully recognized managerial roles and was promised to
9 be paid an extra £300 a month for the extra work I was putting in, due to start from Jan 2020. I
10 had sold two properties to relocate to a splendid English countryside village, where I had a 3
11 bedroomed detached house with nature at my door. It was a short lived period of stability.

12
13 Just a few months after moving in, and a few months after my daughter was born,
14 I split up with my ex-girlfriend, which was very acrimonious. She made many false allegations,
15 of which the police found to be false. Lock-down hit, and I was isolated an hour away from
16 home, alone, and not able to see my daughter, and I had fears for her safety. I turned to family
17 court for help but was met with solicitors prolonging proceedings at the expense of child welfare.
18 This was a period of great pressure and emotional toll. I nearly ceased to have continued living.

19
20 I started drinking heavily again. On the 4th of September 2021, I went into a pub I
21 would not usually go in. The young football team took a disliking to me chatting with a girl I
22 knew. My life was threatened by an older "Hard Man of the village" and I blacked out, trying to
23 escape. A brawl of sorts took place, and in the proceeding weeks, I was arrested for GBH.

24
25 Having no previous criminal convictions or record, I now found myself faced
26 with many false allegations from my ex, a GBH charge, isolated from my baby daughter having
27

1 not seen her for over a year, and with no job because I was too ill to continue teaching, and being
2 forced to sell my home. During this, I could not afford solicitors for Family Court, which forced
3 me to also, be a litigant in person, causing further harm and stress. Additionally, I was fighting
4 very triggering MOD litigations for my War pension entitlement. This is more stress, suffering
5 and hardship than most will ever have to endure in a lifetime, and I was doing it all at once.
6

7 During all of this, On the 24th of November 20121, Arcane aired on Netflix and it
8 was abundantly clear that it was my Bloodborg manuscript, reworked with a facelift to mask it.
9

10 I immediately took to social media, mostly Twitter to contact Riot Games and its
11 employees to inform them. I made sure to make my vulnerabilities and stress of all of this
12 abundantly clear from the off. I understood that plagiarism happens but was naive to its appalling
13 prevalence. To be honest, I thought that, after seeing the impact the infringement was having,
14 during the most traumatic time of my life, Riot, or its founders would reach out and put these
15 horrific crimes right or at least investigate them.
16

17 I hoped that I'd find an honest person to actually look into it. I contacted Riot
18 Games's former CEO Nicolo Laurent, the founders of Riot Games and a bunch of others. I used
19 both Twitter (Now X) and LinkedIn to try and find one decent human to look into the claims.
20 Broken, and broke, I watched Christian Linke and Alex Yee (The fake writers), Nicolo Laurent
21 and Riot's founders, voice actors, with others, celebrating at the premier. I was met with a
22 barrage of insults and gaslighting and people calling me mad on Twitter for a number of weeks. I
23 found gaslighting throughout Arcane's footage, as the Rioter's were calling me insane and a
24 lunatic and other things. I'm sure I fired back some abuse in anger.
25
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1 After many emails and social media messages, I received an email from Dan
2 Chan. Dan Chang serves as Riot’s General Counsel and Secretary, overseeing Riot’s legal
3 matters and legal team across its 20 offices around the globe. The email stated,
4

5
6 “Dear Mr. Wolstenholme,

7 I received a copy of your email below. Your claims alleging IP infringement are
8 without merit.

9 I would appreciate if you do not inconvenience our Founders or employees with
10 such messages going forward.

11
12 Should you wish to discuss further, please direct all legal correspondence to me as
13 the company's counsel. Thank you.

14 Kind regards,

15 Dan”
16

17
18 “Without merit”, before he bothered to investigate the matters.

19 “I would appreciate if you do not inconvenience our Founders or employees with
20 such messages going forward.”

21 Inconvenience what, their champagne parties on the back of my trauma writing.
22 Whilst I was getting food payments, help with bill payments and payments to see my daughter
23 from military charities such as SAFFA, Help for Heroes, Walking with the Wounded. The Royal
24 British Legion (RBL) and my ex-regiment HQ at the Tower of London, RRF charity.
25
26
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1 I then served Riot Games with a Cease and Desist letter. I Received a letter and
2 email in response saying,

3 “ Dear Mr. Wolstenholme,

4
5 Please see attached correspondence in response to your recent letters to various
6 representatives at Riot Games concerning Arcane. As indicated in my letter, please direct any
7 response to the undersigned.

8 Sincerely,

9 Aaron J. Moss”
10
11
12

13 Greenberg Glusker Letter

14 Amongst other things, the letter from Aaron J. Moss of Greenberg Glusker states,
15
16

17 1. “your claim that Riot infringed the copyright in your unpublished
18 manuscript entitled “Bloodborg: the Harvest” (the “Manuscript”) is both legally and factually
19 baseless.”
20

21 Yet they had not investigated the claims to know if this was true.
22
23

24 2. “Your emails appear to suggest that you hired a literary agent whom,
25 without your permission, gave or sold the Manuscript to Riot. This is simply false. Riot did not
26 purchase or acquire your Manuscript to create Arcane.”
27
28

1
2 Yet they had not investigated the claims to know if this was true.

3
4
5 3. “Rather, the program was developed in-house by Riot and its employees
6 over a period of many years.”

7
8 Yet it can be evidenced that this is untrue and not even the 10 year anniversary
9 video was being worked on until the summer of 2019, less for a few failed “Fight Porn” pilots.
10

11
12 4. “The show is not based on any acquired property; to the contrary, and as
13 you know, the show is based on underlying Riot IP from League of Legends, and much of the
14 characters, settings, plots and other copyrightable elements of Riot’s property were first created
15 more than a decade ago.”

16
17
18 Yet every character, location, setting, backstory, appearances and even
19 technologies in the show have been retconned, mostly beyond recognition, making them
20 astonishingly similar to the world and characters of Bloodborg.

21
22
23 5. “To be clear, neither Riot nor the individuals who helped create Arcane
24 ever received a copy of your Manuscript.”

1 And yet, I personally sent it to Riot Forge and the agents who cast the biggest
2 actors in the show.

3
4
5 6. "...but please understand that there is absolutely no truth to your
6 suggestion that your manuscript made its way into Riot's hands."

7
8 So sure, without even investigating, shows a lack of honesty and integrity and a
9 willingness to say anything to gain advantage and to mislead.

10
11
12 7. "In the absence of evidence that Riot had any access to your work, you
13 cannot state a copyright claim as a matter of law."

14
15 This statement was somewhat misleading because it oversimplifies copyright law.
16 While access to the allegedly infringed work is a key factor in proving copyright infringement, it
17 is not the only requirement. While lack of access can weaken a copyright claim, substantial
18 similarity alone can sometimes suffice to infer copying, particularly if the similarity is so striking
19 that independent creation is unlikely. Courts sometimes allow cases to proceed even without
20 direct evidence of access if the similarities are extraordinary. If Riot's work is "strikingly
21 similar" to the plaintiff's work, a claim could still be viable even without direct proof of access.
22 Yet I was misled, in a vulnerable state.

1 8. “While we do not have a copy of your manuscript that would allow us to fully
2 evaluate your claims, it is abundantly clear that there is no possible claim for copyright
3 infringement based on the so-called “similarities” you have identified in your correspondence.”
4

5
6 And yet 100s of “strikingly similar” elements were provided, which now amounts
7 to 1000s, including the whole of the plot structure.
8

9 9. “Whether or not you truly believe that your work has been copied (which
10 is, emphatically, not the case), you appear to be operating under a fundamental misunderstanding
11 of United States copyright law.”
12

13
14 This is now understood to be false and misleading.
15

16
17 10. “In order to establish a claim of copyright infringement under the U.S.
18 Copyright Act, a plaintiff must show that two works are “substantially similar” in creative
19 expression (as opposed to simply ideas) based on both an extrinsic and an intrinsic test. Funky
20 Films, Inc. v. Time.”
21

22
23 And yet more than enough pre-litigation evidence was provided to show that I had
24 a case to pass both the extrinsic test and the intrinsic test.
25

1 11. “The supposed comparisons you cite in your correspondence are exactly
2 the sort of things that copyright law does not protect. You cite stock concepts like the fact that
3 Arcane follows a group of orphans, and that there is a “stocky and rough leadership figure who
4 helps children and is revered as a hero.” Those are merely ideas that are simply not protected by
5 United States copyright law.”
6

7
8 This was misleading and oversimplifying of my case and complaints.
9

10
11 12. “This fact does not change even when you list dozens of purported
12 “similarities.”¹ Under applicable law, lists of similarities are “inherently subjective and
13 unreliable,” and federal courts will not rely on such lists of “random similarities scattered
14 throughout the works” to find substantial similarity. *Litchfield v. Spielberg*, 736 F.2d 1352, 1356
15 (9th Cir. 1984). For that reason, United States courts routinely dismiss copyright infringement
16 claims based on allegations of similarity far more extensive than those you have identified. E.g.,
17 *Shame on You Productions, Inc. v. Elizabeth Banks*, 120 F. Supp. 3d 1123 (C.D. Cal. 2015);
18 *Wild v. NBC Universal, Inc.*, 788 F. Supp. 2d 1083 (C.D. Cal. 2011); *Zella v. E.W. Scripts, Co.*,
19 529 F. Supp. 2d 1124 (C.D. Cal. 2007).”
20
21

22 This was misleading, false representation of my case and oversimplifying of my
23 case and complaints.
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1 13. “In your letter, you incorrectly assert that you would be entitled to
2 statutory damages or attorney’s fees if you were to sue Riot for copyright infringement. Not so.
3 Your Manuscript does not appear to have been registered with the United States Copyright
4 Office, and statutory damages and attorney’s fees are therefore unavailable. 17 U.S.C. § 412 (no
5 award of statutory damages or of attorney’s fees shall be made for any infringement of copyright
6 in an unpublished work commenced before the effective date of its registration).”
7

8
9 This statement is misleading by omission because it fails to inform me of the
10 three-months grace period for published works under 17 U.S.C. § 412.
11

12
13 14. “Please note that the “similarities” you cite are not similar in the first
14 place. Even trivial comparisons are grossly misrepresented in your attachments—your
15 comparisons between a “maroon veil” (sic) and Vi’s hood, or a bar called “The Last Drop” and
16 your use of this ordinary phrase in an entirely different context (referring to the last bit of some
17 food) simply underscore your allegations’ lack of viability. “Ordinary words and phrases are not
18 entitled to copyright protection, nor are ‘phrases or expressions conveying an idea typically
19 expressed in a limited number of stereotyped fashions.’” Bernal v. Paradigm Talent & Literary
20 Agency, 788 F. Supp. 2d 1043, 1071 (C.D. Cal. 2010).”
21
22

23
24 This again, is a complete misrepresentation of my claims and my evidence.
25
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1 15. “It is instead Riot that would be able to recover any attorney’s fees it is
2 required to expend defending any of your frivolous claims. Please understand that this means
3 that if you pursue legal action against Riot you will be exposing yourself to substantial monetary
4 liability. Riot will not hesitate to pursue all available legal remedies in connection with your
5 allegations.”
6

7
8 In my state of distress and anger and upset at my trauma being misused like this, I
9 felt small, bullied, exposed and vulnerable. I felt too weak and poor and too much pressure to
10 take on such a giant under the already, almost unbearable pain and suffering of this period, of
11 which I had informed Riot and it’s solicitors of. Riot’s legal team is clearly aggressive, and this
12 is an attempt to intimidate me into dropping any potential claims. And it worked when I was
13 suffering and nearly dead, shame on you. This is a textbook corporate intimidation tactic. They
14 wanted me to feel helpless so that I would drop my claim without challenging them. But the legal
15 reality is very different from the aggressive picture they painted. This is not only bad faith but a
16 long pattern of aggressive bullying and emotional abuse against a vulnerable party.
17
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19
20 16. “Our law firm regularly defends cases like yours and courts invariably
21 dismiss them at the outset of the lawsuit. We have no doubt that the same result would obtain
22 were you to pursue your baseless claims.”
23
24

25 I felt that this was a big bully threat to have the case kicked out before the Judge
26 has even had a chance to look at the evidence. This is what Riot has been trying to achieve over
27

1 and over, relentlessly with their spurious motions to dismiss to cause further harm and distress.
2 This statement is highly aggressive and misleading, designed to intimidate and discourage me
3 from taking legal action.
4

5
6 17. “I note that you have stated in your correspondence that you do not want
7 the stress of having to fight for years over your supposed copyright claims. Because your
8 allegations of infringement are entirely misguided and based on a serious misunderstanding of
9 copyright law, I urge you to follow your own advice and not waste any more of your energy
10 pursuing these meritless allegations. Your requests for a face-to-face meeting with Riot’s
11 executives and for compensation are rejected in full.”
12

13
14 This response is not legal truth—it is intimidation against a weaker and extremely
15 vulnerable party, in the midst of the most traumatic time of his life, and it’s his trauma writing
16 which is being raped to the bone for all to see, in a pseudo-moralistic manner in which it wasn’t
17 intended, which is alleged to have been used to present a front of false change, diversity and
18 understanding, at a time when Riot was being sued and sanctioned by the state for horrible
19 crimes against thousands of women and employees. Including sexual harassment allegations
20 against the CEO, Nicolo Laurent who greenlit the show in mid (May) 20220.
21
22

23
24 This response, leaning on my mental health to prevent justice and to cause me to
25 drop the claims, is not just ethically and legally wrong, its devilishly aggressive, malicious and
26 wicked. This response from Riot’s legal team is condescending, dismissive, and designed to
27

1 pressure me into abandoning my claims. It is not a neutral or legally objective statement but
2 rather a strategic intimidation tactic, which is still continuing three years later.

3
4 **After the letter.**

5
6
7 Upset and unable to take much more, I was wrongly led to believe that the whole
8 world was against me and everyone in the world are oppressive bullying and heartless cheaters. I
9 nearly didn't make it out of this period. Whilst Riot and their aggression, intimidation and lies
10 did not cause my Complex PTSD, they did cause and continue to cause extreme amounts of
11 emotional and psychological pain and suffering. I deleted Twitter and headed over to LinkedIn.
12 The first post I read was an Asian / Mixed race Rioter saying, "Hey guys, there is some lunatic
13 over on Twitter saying that he wrote Arcane."

14
15 I deleted that too, further isolating myself in suffering, an hour away from my
16 support network and family, during a pandemic, having not seen my baby daughter for over a
17 year. During this time, I watched the fake showrunners, and fake writers take credit for my work,
18 gain awards on my work and be praised for their trauma writing on Arcane, which is my direct
19 real life trauma and suffering, fictionalised. All the while, they knew of the origins of the trauma
20 writing and the effect this was having on me, and yet they attended award ceremonies and parties
21 and interviews and lied about the development of Arcane and even built false timelines to hide
22 their theft. Moreover, Linke and Yee took to interviews, belittling female interviewers, bragging
23 about a Nazi like one-mistake policy now that they are "Bosses", whilst sternly dead eyeing the
24 camera as they give it their best batman voice. And they obsessively called everything fight porn.
25
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1 Then they even made Bridging the Rift which is clearly full of falsehoods, lies
2 and self-aggrandising, whilst knowing that Arcane is stolen goods. They fraudulently took
3 advantage of tax brakes in at least three different countries, non-sexually groomed minors
4 working for Riot, bragged about how they take the mature themes (which are stolen) of diversity
5 seriously whilst others do not, and ignored the interventions of their own peers at Riot, Bro-
6 mancing about with CEO Nicolo Laurent- who was allegedly sexually harassing young female
7 employees - on the Riot “Fuck bout and get paid” machine and effectively deleted years of
8 work, amounting to millions of dollars, and the ideas of real creatives to feed all of Riot’s lore
9 into my narratives, retconning everything, and then firing off 11% of the work force, which
10 accounted for all the narrative teams, because they now had my narratives as the answer to their
11 discombobulated lore and backstories, and they also fired and closed down Riot Forge and it’s
12 teams, which my manuscript was sent to. Additionally, soon after I officially opened these
13 proceedings, Linke “Resigned” blaming haters online. Even in his exit, he had to give it the self-
14 pitying, passive aggressive blaming tactic.

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16
17
18 Because of the added stress and pressure, in a state of hyper arousal, I sent many
19 aggressive emails to the family court. I was charged with malicious communications and sent to
20 Prison for 5 weeks, then spent a further 5 weeks on tag in my home, and a year on probation. I
21 lost my house and had to move back to the city. I haven’t seen my daughter out of a contact
22 centre for 5 years, costing over £500 a month to see her for only 2 hours. I haven’t returned to
23 work since and may never go back to a “Job” and will never teach again.

24
25 If I had the money I should have had from Riot Games, or from my manuscript, I
26 would never have gone to prison. I would have been able to pay for a proper solicitor, thus I
27

1 would have not been acting as a litigant in person. I've lost 5 years of my daughter's life. I've
2 lost my home, my career and so much more. I've been blacklisted from the Literary Industry for
3 speaking out about the prevalence of IP theft from some of the biggest agents and agencies,
4 including "Mega Agent" CEO Jonny Geller and Felicity Blunt of The Curtis Brown Group and
5 their parent company United Talent Agency (UTA), both of which are alleged to have been
6 involved with casting of Arcane, securing an undoable amount of screen time for their talents,
7 without underhanded input, and this has provided many avenues of earning for them, from
8 Arcane.
9

10
11 How on earth do you calculate the pain and suffering of missing your only child's
12 first walk, first tooth, first words, and every early development milestone? This is truly sick.

13 Since then, I've spent countless hours of communications with Riot and it's
14 solicitors and had to face more and more criticism and name calling and horrible hate mail from
15 Rioters, people at fortiche, gobelins animation and the wider toxic community Riot fosters
16 around it. Since talking out about Riot's alleged theft, I have received much hate mail, including
17 a bomb threat, gaslighting, and I have been discriminated against, and my daughter has been
18 targeted with threats of sending AI child porn of her to her school and to her mother. I have been
19 called many names, mostly a lunatic.
20

21 The things being said and sent over emails to my website, from both Riot and
22 Fortiche and from the unhealthy, toxic and dangerous community Riot fosters, are perceived to
23 be horrendous, retaliatory and threatening. Most of it is directed at my mental health, gaslighting,
24 telling me that I am mad, presenting all kinds of fake timelines dating back to 2012, threatening
25 to steal more of my work, and calling me a Transphobic Racist Loser, as well as Christian Linke
26
27

1 condoning murder on X, saying that Fortiche should bring back the guillotine. This is all bad, but
2 the worst is targeting of my daughter. One of the hate mail emails said, “this is why family court
3 took your daughter lmao you are deranged af.” I’ve been raging about this and wrongly took to X
4 to spread what Riot have done to me and my work. Riot’s community, and Rioters, got me
5 suspended from X further harming my brand.
6

7 I’ve spent countless hours learning litigations, investigating and compiling
8 evidence. All of this needs to be calculated into the final settlements.
9
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11

12 **COST AND PROFITS OF ARCANÉ.**

13 The case is unlimited, I’ve issued them with a without prejudice save to cost
14 letter, stating my settlement demands. I’ve stated between 10 million to 100 million pounds.
15 However, this was before the abuse and intimidating and unethical legal practices continued,
16 which has caused more harm, time and emotional toll. Moreover, Arcane has now progressed
17 into all lore, and future cinematics and plans at Riot Games. Thus my work is deeply entwined
18 into all products of Riot Games and their characters and settings. Even Zaun and Piltover have
19 been shaped to fit my narratives.
20

21 Arcane related reports indicate that the two seasons of Arcane cost approximately
22 \$250 million to produce and market. But this is not trustworthy.
23

24 Revenue from licensing deals was limited, with Netflix paying about \$3 million
25 per episode and Tencent contributing an additional \$3 million per episode for distribution in
26 China. These payments covered less than half of the total production costs. This equates to 108
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1 million. But the real profit is loss leader accumulation. Arcane drives more players to their
2 games, it introduced more profitable and playable characters for their games, it fixed their dodgy
3 inconsistent lore of all their products, it gave them more revenue of skins and aesthetics for in
4 game products, as well as making their games more profitable and sort after and better all-round.
5 It also branched Riot into TV, animation and live action markets.
6

7 Because of these copyright cases, I have been unable to launch the M.W. Wolf
8 Megaverse of fiction, which has the potential to be massive, I have an interwoven literary
9 Megaverse which will span many different mediums of storytelling, plus I have the MegaGen
10 Universe with over 600 characters which could be a rival to the MCU. I have been sidelined by
11 copyright infringements and Netflix seems to be the go-to for stolen IP with my work showing
12 up on their streaming platform more than once after I had submitted it, mostly to a Curtis Brown
13 agent in the UK. Thus I've struggled to breakthrough, which of course is anti-competitive.
14

15 I've proven that they have consistently lied about timelines. I've shown 100s of
16 examples of direct infringements. I can evidence that many elements of the animated show and
17 promotional materials derive narrative elements, themes, aesthetics, and character arcs and more
18 from my Bloodborg manuscript which I submitted to Riot Forge in early 2020, when there
19 concept was failing, then they got the greenlight after receiving my manuscript. Even the
20 Psycho-Emotional states, events and traumas which give the show it's tone and appeal, are
21 directly lifted from my trauma writing which is directly referencing my medical records and past
22 traumas.
23
24

25 Riot are playing the big bully game at the moment, but I'll keep fighting until I
26 get results.
27

COST CALCULATION BREAKDOWN

(For Scrutiny and adjustment, adding as the case progresses)

1. Economic and Financial Damages

Unrealised Revenue from Plaintiff's Creative Properties (£500 million)

Estimate based on industry norms for original intellectual property (IP) of this scale.

Comparable licensing deals (e.g., Netflix, Amazon Studios) for IP of similar magnitude.

Lost opportunity for books, films, games, and transmedia franchises.

Loss of Career and Financial Stability (£185,000)

Salary as a lecturer (£37,000/year).

Missed promotions and future earnings over five years.

Family Court Costs (£30,000)

Legal fees for child contact proceedings (£500/month for supervised contact).

Litigation and Administrative Costs (£1 million)

Time spent self-representing (thousands of hours at reasonable hourly rates).

Costs of legal research, document filing, evidence compilation.

2. Emotional and Psychological Damages

Intentional Infliction of Emotional Distress (£100 million)

Precedents in high-profile emotional distress claims.

Impact of stolen trauma writing & Riot's retaliation on Plaintiff's mental health.

Comparable damages in defamation & harassment lawsuits.

Impact on Family Life (£50 million)

The emotional toll of losing access to child due to financial/legal struggles.

3. Reputational Harm

Damage to Plaintiff's Creative Brand (£25 million)

Blacklisting in publishing/entertainment industries.

Loss of reputation, missed collaborations.

Defamation and Retaliation (£10 million)

Psychological harm from Riot's gaslighting and public attacks.

Industry-wide reputational damage.

4. Anti-Competitive Practices (£50 million)

Unfair Competition under California Law

Riot's exploitation of IP to dominate industry & block Plaintiff's entry.

Estimated market loss based on industry projections.

5. Punitive Damages (£500 million)

Why so high?

Riot's repeated history of unethical behaviour (e.g., lawsuits, toxic workplace culture).

Court-imposed penalties for misconduct, ethical violations, and deliberate harm.

DECLARATION

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on February 6, 2025, at Coventry, England.

Respectfully submitted,

The Plaintiff, Marc Wolstenholme, M.W. Wolf.

Date: February 6, 2025

Signed: *M.WOLSTENHOLME.*